

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
NORTHWESTERN DIVISION

UNITED STATES OF AMERICA

v.

VINCENT EARL DIONNE;
RACHELLE JANE BAKER,
a/k/a RACHELLE DEANE;
CLAY BROOKE LEFT HAND;
LACEY JADE FOX;
TELIEA KATERI BAKER;
ELIZABETH DEBRA HALE,
a/k/a BETH HALE;
DANCING ECHO LEEVON KNIGHT,
a/k/a ECHO IRWIN; and
GUY CURTIS SLATES

INDICTMENT

Case No. _____

Violation: 18 U.S.C. §§ 2, 922(g)(1),
924(a)(2), and 924(c)(1)(A); and 21
U.S.C. §§ 841(a)(1), 841(b)(1)(C), and
846

COUNT ONE

Conspiracy to Distribute and Possess with Intent to Distribute Heroin

The Grand Jury Charges:

From in or about November 2012 and continuing until in or about July 2013, in
the District of North Dakota,

VINCENT EARL DIONNE;
RACHELLE JANE BAKER, a/k/a RACHELLE DEANE;
CLAY BROOKE LEFT HAND;
LACEY JADE FOX;
TELIEA KATERI BAKER;
ELIZABETH DEBRA HALE, a/k/a BETH HALE;
DANCING ECHO LEEVON KNIGHT, a/k/a ECHO IRWIN; and
GUY CURTIS SLATES,

knowingly and intentionally combined, conspired, confederated, and agreed together and
with others, both known and unknown to the grand jury, to distribute and possess with

intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute and possess with intent to distribute heroin, a Schedule I controlled substance, within the Fort Berthold Indian Reservation; the City of Bismarck; and elsewhere, in the State of North Dakota;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;
3. It was a further part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
4. It was a further part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of heroin and other controlled substances; and,
5. It was a further part of said conspiracy that the defendants and others traveled between the Fort Berthold Indian Reservation, Burleigh and Morton Counties in North Dakota, and elsewhere, to obtain and distribute heroin;

In violation of Title 21, United States Code, Section 846.

COUNT TWO

Distribution of Heroin

The Grand Jury Further Charges:

On or about June 27, 2013, in the District of North Dakota,

VINCENT EARL DIONNE and
RACHELLE JANE BAKER, a/k/a RACHELLE DEANE,

individually and by aiding and abetting, knowingly and intentionally distributed heroin, a
Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),
and Title 18, United States Code, Section 2.

COUNT THREE

Distribution of Heroin

The Grand Jury Further Charges:

On or about July 11, 2013, in the District of North Dakota,

VINCENT EARL DIONN and
RACHELLE JANE BAKER, a/k/a RACHELLE DEANE,

individually and by aiding and abetting, knowingly and intentionally distributed heroin, a
Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),
and Title 18, United States Code, Section 2.

COUNT FOUR

Distribution of Heroin

The Grand Jury Further Charges:

On or about July 18, 2013, in the District of North Dakota,

VINCENT EARL DIONNE and
RACHELLE JANE BAKER, a/k/a RACHELLE DEANE,

individually and by aiding and abetting, knowingly and intentionally distributed heroin, a
Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),
and Title 18, United States Code, Section 2.

COUNT FIVE

Possession with Intent to Distribute Heroin

The Grand Jury Further Charges:

On or about July 18, 2013, in the District of North Dakota,

VINCENT EARL DIONNE;
RACHELLE JANE BAKER, a/k/a RACHELLE DEANE; and
CLAY BROOKE LEFT HAND,

individually, and by aiding and abetting, knowingly and intentionally possessed with
intent to distribute heroin, a Schedule I controlled substance;

In violation of Title 18, United States Code, Section 2, and Title 21, United States
Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

Possession of a Firearm by a Convicted Felon

The Grand Jury Further Charges:

On or about July 18, 2013, in the District of North Dakota,

VINCENT EARL DIONNE

having been convicted of the following crimes, each punishable by imprisonment for a term exceeding one year: (a) Assault – 2nd Degree – Dangerous Weapon, in Hennepin County (Minnesota) District Court, case number 27-CR-01-074519, in or about February 2002; and, (b) Simple Robbery, in Hennepin County (Minnesota) District Court, case number 27-CR-02-095641, in or about February 2003, did knowingly possess in and affecting commerce a firearm, that is, one Glock, model 32, .357 caliber pistol, bearing serial number KSZ193;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SEVEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The Grand Jury Further Charges:

On or about July 18, 2013, in the District of North Dakota,

VINCENT EARL DIONNE

possessed a firearm, namely, a Glock, model 32, .357 caliber pistol, bearing serial number KSZ193, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to-wit: Conspiracy to Distribute and Possess With Intent to Distribute Heroin, Distribution of Heroin, and Possession of Heroin With Intent to Distribute, as set forth in Counts One, Four, and Five above;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

A TRUE BILL:

/s/ Grand Jury Foreperson
Foreperson

/s/ Timothy Q. Purdon
TIMOTHY Q. PURDON
United States Attorney

RLV: rab